

LAW OFFICE OF GARY H. LOMANNO, LLC
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UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY
(CAMDEN VICINAGE)

SHAWN SMEDLEY,	:	
	:	
	:	CIVIL ACTION NO. 20-19102
	:	
Plaintiffs	:	
	:	
v.	:	COMPLAINT
	:	
	:	
UNITED STATES POSTAL	:	
INSPECTION SERVICE, UNITED	:	
STATES POSTAL POLICE, JOHN	:	
DOE, jointly, severally	:	
and/or in the alternative,	:	
	:	
Defendants	:	

The plaintiff, Shawn Smedley, residing at 444 Madison Avenue, Williamstown, New Jersey, by way of complaint against the above named parties, says:

JURISDICTION AND VENUE

This Court has jurisdiction over this matter pursuant to 28

U.S.C. Section 1332 in that "the matter in controversy exceeds the sum or value of \$75,000.00, exclusive of interest and costs and is between a citizen and a United States Government entity."

PARTIES

1. Plaintiff, Shawn Smedley, resided at 444 Madison Avenue, Williamstown, New Jersey at all times relevant hereto.
2. Defendant, United States Postal Inspection Service, in a Federal Agency.
3. Defendant, United States Postal Service, is a Federal Agency.
4. Defendant, John Doe, is an unnamed employee of the Defendants, United States Postal Inspection Service and/or United States Postal Service.

FIRST COUNT

1. On or about the 18th day of December, 2018, the plaintiff, Shawn Smedley, was the operator of a vehicle which was stopped on Lindberg Blvd. at the intersection with 70th Street, Philadelphia, Pennsylvania.
2. At the same time, the defendant, John Doe, was the operator of a motor vehicle, with the complete knowledge and authority of the owner and defendants, United States Postal

Inspection Service and/or United States Postal Service, driving on Lindberg Blvd. approaching the intersection of 70th Street, Philadelphia, Pennsylvania.

3. At said time and place, the defendants operated the aforementioned vehicle in such a careless and negligent fashion so as to cause a violent collision.

4. At all times relevant herein, the defendant, John Doe, was an agent, servant and/or employee of the defendants, United States Postal Inspection Service and United States Postal Service, and operated said vehicle in the scope of his employment. The defendant, United States Postal Inspection Service and United States Postal Service, is liable to the plaintiff, Shawn Smedley, for the acts of the defendant, John Doe, through the doctrine of respondeat superior.

5. As a direct and proximate result of the negligence of the defendants, United States Postal Inspection Service, United States Postal Service and John Doe, and the collision which resulted, plaintiff, Shawn Smedley, was caused to suffer injuries of a temporary and permanent nature, was caused and will be caused to experience great pain and suffering, was caused and will be caused to suffer a loss of earnings and a diminished earning capacity, was caused and will be caused to seek medical attention for his injuries, was caused and will be caused to experience great anxiety, and was otherwise injured and damaged, all to his great loss and detriment.


WHEREFORE, the plaintiff, Shawn Smedley, demands judgment against the defendants, United States Postal Inspection Service and/or United States Postal Service and John Doe, jointly, severally and/or in the alternative for such sums as will reasonable compensate the plaintiff for his damages according to the laws of New Jersey, plus costs of suit, and for whatever other relief the Court deems equitable and just.

DEMAND FOR JURY TRIAL

The plaintiffs demand a trial by jury as to all issues contained herein.

Dated: 11/26/20

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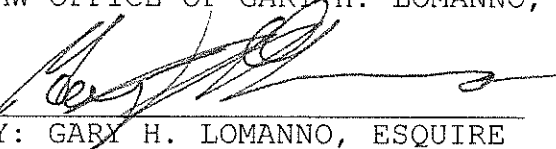

By: Gary H. Lomanno, Esq.
Attorney for Plaintiff

DESIGNATION OF TRIAL COUNSEL

Gary H. Lomanno, Esquire, is hereby designated as trial counsel for the plaintiff in the above captioned matter.

Dated: 11/26/20

LAW OFFICE OF GARY H. LOMANNO, LLC


BY: GARY H. LOMANNO, ESQUIRE
Attorney for Plaintiff